

Form Letter	Comment Text
12	<p>Below are some specific recommendations, and also included by reference are the comments of Public Lands Advocacy regarding the Rawlins Draft Environmental Impact Statement and Resource Management Plan. • I support the elimination of the Western Heritage Alternative and the expanded wilderness alternative from detailed analysis because neither complies with the Federal Land Policy and Management Act (FLPMA) or the Mining and Minerals Policy Act of 1970. These laws require that management of public lands recognize the need for domestic sources of minerals and that the federal government is required to "foster and encourage private enterprise" to develop minerals "to help assure satisfaction of industrial, security and environmental needs". • The DEIS fails to provide a balanced approach to management of oil and gas resources with other surface resource values. Therefore, it is impossible to support the preferred alternative because it would impose needlessly restrictive mitigation measures upon exploratory and in-fill development opportunities. • I object to the term "disruptive activities." The assumption that activities requiring personnel to remain in an area for more than one hour is disruptive is without merit. Additionally, no sideboards are included in the definition as to levels of significance associated with various actions. Under this definition, virtually any and all activity would be considered disruptive. The term is being used as a catchall for applying additional stipulations and conditions of approval (COA) on activities that will likely not result in any impact on resources. I also object to the definition of "intensive management." As defined, "Intensive management" implies that during the course of ordinary management, BLM does not require operators to comply with stipulations or conditions of approval imposed on their activities. This is hardly the case. Yet, it is necessary for the definition to acknowledge that even under Intensive Management, BLM's action must "Ensure that such mitigation is either statutorily required or scientifically justifiable and is the least restrictive measure." • Deviated drilling must not be viewed as a panacea to resolution of land use conflicts because the utility of directional or horizontal drilling methods is limited in a number of ways. It must also be recognized that pad sizes associated with directional drilling of several wells from a single pad will exponentially increase to accommodate the additional well bores. While surface issues may give rise to considering directional or horizontal techniques, the federal land management agencies must recognize that these decisions can only be made with careful consideration to the many other factors that have an effect on a project's viability. • Insufficient or inaccurate information exists in both the DEIS and the Technical Support Document to allow an accurate analysis of the emissions attributable to either coal bed natural gas or conventional oil and gas development. The estimates in Tables A4-5, A4-10 and 4-1 and Sections 4.2.2-5 overestimate potential emissions and we recommend using Universal Compression's 'Compressor Horsepower Selection Chart' and Wyoming State guidelines. • Many wildlife stipulations or management objectives are based upon inaccurate scientific data or assumptions and must be revised; i.e., sage grouse, mountain plover and white tailed prairie dogs. In addition, BLM needs to assess the impacts of overlapping timing limitation stipulations on the oil and gas industry, increased impacts to resources and socio-economic impacts. • The socio-economic portion of the DEIS is flawed in that it fails to consider all types of economic impacts – direct, indirect and induced. Additionally, the DEIS describes the expected change in employment from changes in drilling activity but fails to mention the changes in output or value added. The significance criteria used by BLM is flawed because it relies on trend analysis and a meaningless threshold. There is no literature presented, logic, or evidence presented as to why employment or mineral ad valorem taxes should not fluctuate away from the trend line in the future anymore than they did in the past 20 years. Suggest the BLM do away with the significance criteria because, as constructed now, it provides no information. Thanks for the opportunity to comment on this document, and I look forward to participating further in this process.</p>

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